

Docket No. 96-0404
LCI International Telecom Corp.

processing the billing data that LCI receives from the Bell operating companies in those regions in which LCI has entered the local exchange service business, including Illinois. I am responsible for the day-to-day operations of the Data Center, and before becoming the Operations Manager, I helped design the underlying systems architecture that is now employed in LCI's billing operations.

Q. When did LCI begin offering local telephone service in Illinois?

A. LCI entered the Illinois market in late October of 1996 as a reseller of Ameritech's local service. To date, LCI is reselling local service to small business customers only.

Q. Have you been responsible since that time for overseeing the receipt and processing of billing information from Ameritech in connection with LCI's resale business in Illinois?

A. Yes, I have.

Purpose of Testimony

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to address the issue of whether Ameritech is providing access to the functionality in its Operation Support Systems ("OSS") on

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a nondiscriminatory basis. While I do not intend to address this issue globally, I do want to identify problems that LCI has experienced to date in obtaining timely billing information from Ameritech in connection with LCI's local exchange service business in Illinois.

Types of Billing Information Received From Ameritech

Q. Please explain the types of billing information that LCI currently receives from Ameritech?

A. Ameritech sends two types of billing data to LCI: (1) daily usage files; and (2) monthly bills from the Ameritech's Electronic Billing Service (referred to by Ameritech as "AEBS").

Q. What are daily usage files?

A. Daily usage files contain the call record information that LCI needs to bill its end-user customers. When one of LCI's end-users makes a call, information concerning that call, including the customer's telephone number and the length of call, is captured electronically by Ameritech's switch at the time call passes through the switch. Ameritech sends this call record information to LCI in what are called daily usage files, which are batch files that often contain the call record information for several thousand calls.

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Q. How does Ameritech send daily usage files to LCI?

A. LCI is currently working on developing the interfaces that will enable it to communicate electronically with all aspects of Ameritech's OSS. This is an expensive and time consuming undertaking, particularly for a smaller long distance company like LCI, and during this development process, LCI has had to rely on manual processes, principally fax machines, for its communications with Ameritech's OSS. LCI has, however, established an electronic link for billing information through a network data mover known as "Connect:Direct." Ameritech sends daily usage files to LCI via this electronic link.

Q. What are the AEBS bills?

A. An AEBS bill is, in effect, an invoice from Ameritech to LCI for the services LCI has purchased from Ameritech and which LCI, in turn, has resold to its end-user customers. The AEBS bill contains a monthly summary of recurring charges such as flat rate service charges, and non-recurring charges such as installation charges and service fees for maintenance calls. As with call record information, LCI needs this information in order to bill its end-user customers. The AEBS bill is in a format that is proprietary to Ameritech and LCI had to develop translation

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software for this format. Like the daily usage files, Ameritech sends the AEBS bill to LCI electronically via Connect:Direct.

Ameritech's Delays in Providing Billing Information

Q. Is LCI receiving AEBS bills in a timely manner?

A. No. In the AEBS Implementation Guide that Ameritech provided to LCI, Ameritech indicates that if AEBS is transmitted electronically (which it is, in the case of LCI), the AEBS file will be available for retrieval within six to eight days of the completion of the billing cycle. (The relevant excerpt from the AEBS Implementation Guide is attached hereto as Exhibit A.) LCI's billing cycle ends at the end of each calendar month. Ameritech sent LCI the AEBS bill for the billing cycle ending on January 31, 1997, on March 11, 1997, more than a month late. Ameritech sent LCI the AEBS bill for the billing cycle ending February 28, 1997, on March 26, 1997, more than two weeks late. For the billing cycle ending March 31, 1997, Ameritech did not send the AEBS bill until April 17, 1997, approximately a week past the committed due date.

Q. Is LCI receiving the call record information contained in daily usage files in a timely manner?

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A. No. Ameritech's switches capture the call record information from a call made by an LCI end-user at the time the call passes through the switch. I believe Ameritech should be providing this information to LCI within 24 to 36 hours after the call has been made, as that is the period of time in which LCI provides similar long-distance call record information to resellers of LCI's long distance service. Ameritech committed in its resale agreement with LCI to use "best efforts" to ensure that call record information is transmitted to LCI within at least 72 hours after the call is made. Ameritech is not even meeting this lenient standard on a substantial number of the calls made by LCI end-user customers.

Q. Does LCI keep records that enable you to determine the number of days between the date an LCI end-user customer makes a call and the date on which LCI receives that call record information from Ameritech?

A. Yes we do. Our computer system is able to generate a report that shows the distribution of call record data received from Ameritech.

Q. Have you run those reports and, if so, can you please tell us what they show?

A. Yes I have. Our experience has been, and these reports confirm that LCI receives virtually no call record information from Ameritech within 24 to 36 hours after the

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call was made, and that Ameritech is failing to meet its own 72 hour commitment on a substantial number of calls. For example, in December of 1996, LCI received call record information on approximately 60% of its calls four days or more after those calls had been made. While that number has improved slightly over the past three months, LCI is still receiving call record information on over 40% of the calls four days or more after those calls were made. A more complete summary of the distribution of call record data received from Ameritech is attached hereto as Exhibit B.

Q. Has LCI complained to Ameritech about the lateness of both the AEBS bill and the call record information in daily usage files?

A. Yes, we have complained to Ameritech about these issues on numerous occasions, yet they still have not been rectified by Ameritech.

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Adverse Impact Upon LCI's Business in Illinois.

Q. Have Ameritech's delays in providing billing information to LCI had any adverse impact upon LCI's business in Illinois and, if so, please describe that impact?

A. Yes it has. The adverse impact upon LCI's business includes:

Untimely call record information has resulted in billing delays: Many of the customers whom LCI has persuaded to leave Ameritech were already long distance customers of LCI. These customers expect and want to receive one bill from LCI that incorporates all the local and long distance calls made by that customer during that billing cycle. LCI typically has all of the information necessary to invoice its long distance service within one to two days following the close of the business cycle. Because of Ameritech's failure to timely transmit local service call record data, LCI is forced to delay sending its combined invoice to its customers for an additional three to five days, and sometimes even longer. Some customers of LCI (both local service only and combined long distance and local service) have complained that they have not been receiving their invoices on as timely a basis as they previously had when their local service was provided by Ameritech.

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Billing delays affect LCI's cash flow: When LCI is forced to delay sending invoices for four or five days (or even more), this affects LCI's cash flow because it typically means LCI is paid four or five days (or more) later than it should have received payment. While the dollar amount of the current delayed invoices is not substantial given that LCI is a recent entrant in the local service market in Illinois, the amount is anticipated to become significant if LCI meets its projections for growth in its local service business.

Untimely billing information from Ameritech results in local calls and other charges being billed out of cycle: Even though LCI has delayed invoicing its customers, LCI has still been forced to back-bill local calls and monthly non-recurring charges due to Ameritech's failure to timely provide call record information and AEBS bills.

When LCI sends late bills to its customers and when those bills include charges that were incurred in earlier billing cycles, this impacts not only LCI's revenue and cash flow, but its credibility with its customer base. Given these circumstances, LCI is not at parity with Ameritech in its ability to timely bill its end-user customers, which makes it more difficult for LCI to compete against Ameritech for local service business in Illinois.

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Q. Does that conclude your testimony?

A. Yes, it does.

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LCI International®

Worldwide Telecommunications

April 29, 1997

Michael O'Sullivan
Ameritech
7802 Quarry Cliff Court
Reynoldsburg, Ohio 43068

Dear Mike,

Per our conference call on Monday, April 29, 1997, below I have outlined some issues and action items that we discussed.

Warm Transfer and Inside Wiring: This issue has been documented in several letters to Ameritech and has been outstanding since October, 1996. On yesterday's call you gave me a flat-rated, estimated price for Warm Transfer in Ohio of \$800, with an NRC charge of approximately \$45. You also stated that since we have a resale agreement in Ohio this is the only region you will offer us Warm Transfer without LCI agreeing to a region-wide agreement for Warm Transfer service. Because the price will vary state to state, we will have to discuss the other states and pricing after execution of such agreement. You also stated that you thought LCI would receive pricing for Inside Wiring on our next conference call which will take place on 5/2/97. It is LCI's understanding from Ameritech that both services will not be available until June, 1997.

1B8: On 4/7/97, we discussed an issue involving a USOC (1B8) in Chicago. Specifically, when LCI is "assuming" customers "as is" this USOC is showing up on the CSR. You originally stated that this USOC is a flat-rated product and you stated that not only can you not provide us usage for these customers, but you are curious as to how we are getting these customers in the metropolitan Chicago area when Ameritech doesn't sell their flat-rated product except in the rural areas. We have since found out from Ameritech that 1B8 is the equivalent of a 1MB USOC in other Ameritech regions; however, we have still been informed that usage cannot be provided to LCI. Ameritech has been researching this for the last few weeks, but, to date, has only been able to account for explaining once customer's (Electric-Flex Co.) usage out of a list of approximately 20 customers and LCI still has heard of no resolution to our problem of not receiving usage. Since LCI is getting no usage, we cannot bill our customers. This is a very important issue and LCI expects resolution on this matter right away. On a conference call on 4/17/97 with various LCI and Ameritech employees, you promised an immediate conference call with Ameritech's Billing Group to discuss and resolve this issue. This call has still not taken place even though I have requested this from you at least 3 separate times, via phone, e-mail and letter.

Late Receipt of AEBS: This issue has been ongoing since 11/11/96 and has been outlined in two prior letters to Ameritech. As we discussed on yesterday's call, the delay in the receipt of this data is absolutely inexcusable! I have listed below the dates in which we received the data:

November's AEBS received via tape on 1/6/97
December's AEBS received via tape on 1/14/97
January's AEBS received via NDM on 3/1/97
February's AEBS received via NDM on 3/26/97
March's AEBS received via NDM on 4/17/97

TAB C-1

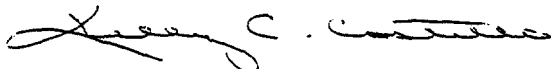
As you will note, not one of these was received on time. Yesterday you told me that you expected no delay in the receipt of April's AEBS; however, based on past performance, LCI remains skeptical that this will happen.

La Rabida: This customer problem has been discussed with Ameritech time and time again since December, 1996. The latest is that there are still 5 orders with several lines on LCI's system and La Rabida is being billed by LCI because Ameritech is having problems transferring these back to their system. Although Jill Collins provided telephone numbers of the lines associated with those orders to Bill Jones on Friday, April 25th, LCI needs daily updates and a completion date from Ameritech of when this issue will finally be resolved. On a 4/17/97 conference call LCI was promised a completion date, which we have never received. We also discussed having a meeting/conference call in mid-May to discuss LCI and Ameritech possibly compensating La Rabida for their time and troubles.

T-1 Ordering Processes: As we discussed on 4/24/97 and again on yesterday's call, I would like to receive, no later than 5/2/97, the forms and procedures that Ameritech requires for LCI to resell T-1 service.

Again, these are only a few of the outstanding issues between Ameritech and LCI. I look forward to our conference call on 5/5/97 and hope that we may resolve these issues on or before our call.

Sincerely,



Kelly C. Costello

cc: Anne Bingaman
Greg Casey
Warren Mickens
Jim Styf
Allen Groh
Chuck Avolio

LCI International®

Worldwide Telecommunications

April 9, 1997

Michael O'Sullivan
Ameritech
Resale Market Consultant
7802 Quarry Cliff Court
Reynoldsburg, Ohio 43068

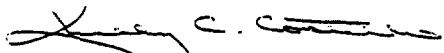
Dear Mike,

Per our conference call on Monday, April 7, 1997, below I have outlined some issues and action items that we discussed.

- LCI has requested that a documented coordination procedure be put in place for when a customer is moving from one reseller to another. This request has been outstanding since 2/10/97; in a letter written by Kirsten Johnson on 3/24/97, she requested a completion date for this procedure of 3/27/97. This procedure has still not been completed and you, on behalf of Ameritech, have now promised me a completion date for this project on 4/14/97.
- Starting on 11/11/96, LCI has requested inside wiring and Line Backer proposals from Ameritech. LCI was informed on our 3/31/97 conference call that we will not receive Line Backer, but will receive pricing for Warm Transfer and Inside Wiring. This pricing is long overdue and, as we discussed, LCI expects to have this pricing on or before our 4/21/97 conference call.
- Since 12/16/96, LCI has requested that the daily usage file that we receive from Ameritech should be received with the most current information and in a timely manner in order for LCI to do our monthly billing. Even though the Ohio resale agreement states that usage will be provided to LCI within a 72-hour timeframe, LCI is receiving 37% of usage in a 4-day timeframe and 96% in a 5-day timeframe. This certainly does not constitute even "best efforts" on Ameritech's part.
- On 4/7/97, we discussed an issue involving a USOC (1B8) in Chicago. Specifically, when LCI is "assuming" customers "as is" this USOC is showing up on the CSR. This USOC is a flat-rated product and you stated that not only can you not provide us usage for these customers, but you are curious as to how we are getting these customers in the metropolitan Chicago area when Ameritech doesn't sell their flat-rated product except in the rural areas. You stated you would look into this immediately and get back to me this week.

I look forward to our conference call on 4/14/97 and hope that we may resolve several of these issues in a timely manner.

Sincerely,



Kelly C. Costello
Project Coordinator

cc: Anne Bingaman
Greg Casey
Mike Wajsglas

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LCI International®

Worldwide Telecommunications

April 28, 1997

Michael O'Sullivan
Ameritech Information Industry Services
111 N. Fourth Street
Room 1480
Columbus, Ohio 43215

Dear Mike:

Per our conference call on 4/17/97, the following issues and action items were discussed:

Embassy Executive:

This customer problem has been ongoing since December, 1996. The latest response from Ameritech is that Jim Styf mailed the January and February bills to Gary Carter at LCI; Gary never received these bills. Jim is going to re-mail the bills to Gary Carter and Wayne Charity, they will be received no later than 5/1/97; the delay is due to the fact that these bills are not handled in house and Ameritech needs to request them.

La Rabida:

This customer problem has been ongoing since December, 1996. LCI is still getting usage on these lines even though they are no longer an LCI customer and requested to be switched back to Ameritech in February, 1997. Jill Collins/Jim Styf state that 5 orders have been escalated to an Ameritech analyst. Jill will provide to Bill Jones a list of the lines that are associated with those 5 orders. Jill stated to LCI that she expects a completion of the La Rabida situation on 4/25/97. Jim Styf stated that the only way to know that everything is complete is by doing manual checks on all the lines; AECA (?) systems are updated on a monthly basis.

In mid-May, LCI and Ameritech will have a meeting/conference call to discuss how Ameritech and LCI can compensate La Rabida.

1B8 USOC in Chicago (same as 1MB in other Ameritech regions):

LCI wants to receive the customer usage associated with the 1B8 USOC; Ameritech states they cannot provide usage. Ameritech has since started to investigate, but LCI is still not receiving any usage for the customers associated with 1B8. You will call me to schedule a separate conference call to take place immediately to discuss this issue and other billing issues; call will include Charity, Traut, Jones, Marlin, Rausch, Strombotne, Costello.

As of today, 4/28/97, this call has still not been scheduled.

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Backlog:

LCI has experience a backlog of 5-8 days on orders from Ameritech. We have also experienced a similar delay on receiving reject orders back from Ameritech. Ameritech stated we should have a 24-hour turnaround time on these requests; Jim Styf mentioned that after mandatory overtime being worked this weekend to clear up backlog, LCI's orders will be processed within a day.

Completion Dates:

Test of completion notification dates requested took 7 business days to receive back from Ameritech. LCI will begin providing customer information to Ameritech by cob every Friday; Ameritech will respond with the completion dates by the following Tuesday at 12:00.

Reservations:

LCI has come up on a situation of being required to fill out separate forms for reservations; Ameritech states that this has always been their procedure and they will "fill us in" and supply Beth Rausch of LCI with the forms required for this procedure. Cathy Wyban will keep me informed of any new processes Ameritech is requiring on our weekly conference calls so I can inform everyone internally at LCI.

Voicemail:

When LCI implements the reselling of Ameritech's voicemail, customer will be disconnected from Ameritech system (OcTel) and will be transferred to AIIS system (Boston Technologies).

Warm Transfer/Inside Wiring:

Pricing will be available for Warm Transfer service on 4/25/97; Ameritech is unsure about pricing timeframe for Inside Wiring service. Both services will be available to LCI in the June 1997 timeframe. LCI has been informed that 611 service in Illinois will be discontinued in late-May/early-June.

I look forward to hearing from you and your Ameritech associates with regard to several of these issues.

Sincerely,



Kelly C. Costello

cc: Anne Bingaman
Greg Casey
Wayne Charity

LCI International®

Worldwide Telecommunications

April 29, 1997

Michael O'Sullivan
Ameritech
7802 Quarry Cliff Court
Reynoldsburg, Ohio 43068

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TAB D-4

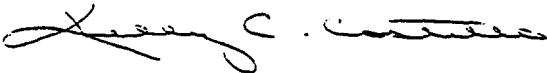
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Kelly C. Costello

cc: Anne Bingaman
Greg Casey
Warren Mickens
Jim Styf
Allen Groh
Chuck Avolio

Illinois Proposed

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission :
On Its Own Motion :
: 96-0404
Investigation concerning :
Illinois Bell Telephone :
Company's compliance with :
Section 271 (c) of the Telecom- :
munications Act of 1996. :

HEARING EXAMINER'S PROPOSED ORDER

March 6, 1997

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STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

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On its Own Motion	:	
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Investigation concerning Illinois Bell Telephone	:	
Company's compliance with Section 271(c) of the	:	
Telecommunications Act of 1996.	:	

HEARING EXAMINER'S PROPOSED ORDER

By the Commission:

I. INTRODUCTION

On August 26, 1996, we issued our Order Initiating Investigation ("OII") commencing this docket. As stated in the OII, this docket was initiated to gather information regarding the compliance of Illinois Bell Telephone Company, d/b/a Ameritech Illinois ("Ameritech"), with Section 271(c) of the federal Telecommunications Act of 1996 ("Act"), 47 U.S.C. § 271(c). The purpose for gathering this information is to fulfill our consulting role with the Federal Communications Commission ("FCC") under Section 271(d)(2)(B) when Ameritech applies for FCC authorization to provide in-region interLATA telecommunications services.

Toward this end, we attached as Appendix A to our OII a list of thirty questions/areas of inquiry that we directed the parties to address in this docket. Because much of the information that we seek is in the possession of Ameritech or other telecommunications service providers to whom we have granted certificates of service authority under Section 13-405 of the Illinois Public Utilities Act ("IPUA"), we named as parties to this docket all such certificated service providers. Specifically, we made Ameritech and the following service providers parties to this docket: AT&T Communications of Illinois, Inc. ("AT&T"), A.R.C. Networks, Inc.; Ameritech Advanced Data Services of Illinois, Inc.; Consolidated Communications Telecom Services, Inc. ("CCT"); Diginet Communications Inc. - Midwest Digital Services Corporation, d/b/a Virginia Digital Services Corp.; LCI International Telecom Corp.; MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. (collectively "MCI"); McLeod Telemanagement, Inc.; MFS Intelenet of Illinois, Inc. ("MFS"); Microwave Services, Inc.; One Stop Communications, Inc.; Preferred Carrier Services, Inc.; SBMS Illinois Services, Inc.; Sprint Communications L.P., d/b/a Sprint Communications Company ("Sprint"); TCG Illinois, Inc. ("TCG"); TCI Telephony Services of Illinois, Inc.; Telefiber Networks of IL, Inc.; U.S. OnLine Communications L.L.C.; USN Communications, Inc. ("USN"); Winstar Wireless of Illinois, Inc.; and Worldcom, Inc.

Pursuant to notice, as required by law and the rules and regulations of the Commission, pre-hearing conferences were held before a duly-authorized Hearing Examiner of the Commission at its Chicago offices on September 11, October 1, October 4 and December 2, 1996. The following parties petitioned for and were granted leave to intervene by the Hearing Examiner: the Illinois Telephone Association ("ITA"); the Illinois Independent Telephone Association ("IITA"); the Illinois Attorney General on behalf of the People of the State of Illinois ("IAG"); the

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96-0404

H.E PROPOSED ORDER

Telecommunications Resellers Association ("TRA"); Consolidated Communications, Inc.; the Competitive Telecommunications Association ("CompTel"); the Citizens Utility Board ("CUB"); the Cable Television and Communications Association of Illinois; and Access Network Services, Inc. ("Access"). The Illinois Commerce Commission Staff ("Staff") also appeared and actively participated in this docket.

Evidentiary hearings were held on January 13-17 and January 21, 1997. At the conclusion of the latter hearing, the record was marked Heard and Taken.

Messrs. David Gebhardt, John Gregory Dunny, Wayne Heinmiller, Scott Alexander, Ramont Bell, John Pautlitz, Warren Mickens, and Joseph Rogers and Ms. Lisa Robertson filed testimony on behalf of Ameritech.

Testimony was filed on behalf of the Staff by Ms. Charlotte TerKeurst, Mr. Jake Jennings, Ms. Stacy Buecker, Mr. S. Rick Gasparin, Mr. Samuel McClerren and Mr. Sam E. Tate.

Testimony on behalf of AT&T was filed by Messrs. John Puljung, Wayne Fonteix, Robert Falcone, Michael Pfau, William Lester, Timothy Connolly, and Mr. Michael Starkey, and Ms. Judith Evans.

Testimony on behalf of MCI was filed by Mr. Carl Giesy.

Testimony on behalf of Sprint was filed by Ms. Betty L. Reeves and Dr. Carl Shapiro.

Testimony on behalf of CompTel was filed by Mr. Joseph Gillan.

Testimony on behalf of MFS was filed by Ms. Ruth Durbin.

Testimony on behalf of CCT was filed by Mr. Scott Jennings.

Before turning to a discussion of the information presented by the parties and Staff and the conclusions that we deduce from that information, it is important to recognize the unique nature of this docket. The purpose of this docket is not to adjudicate the rights of any party per se. Rather, as noted above, the purpose of this docket is to gather information regarding Ameritech's compliance with Section 271(c) in order to fulfill our consulting role with the FCC under Section 271(d)(2)(B) of the Act.

While our information-gathering mission is primarily factual in nature, we note that there is little, if any, dispute between the parties regarding the underlying facts presented in this docket. Many of the core disputes in this docket involve legal issues regarding the interpretation, and application to the record facts, of the provisions of Section 271(c). We acknowledge, of course, that the determination of how Section 271(c) should be interpreted and applied is ultimately within the FCC's domain, and not ours. However, in order to provide the FCC with meaningful and timely comments as part of our consulting role, and in the absence of any prior pronouncements by the FCC regarding how Section 271(c) should be interpreted and applied, we cannot avoid addressing certain of these legal issues, even if our conclusions on these issues are non-binding.

96-0404

H.E PROPOSED ORDER**II. LEGAL ISSUES REGARDING INTERPRETATION AND APPLICATION OF SECTION 271(c)****A. SECTION 271 REQUIREMENTS IN GENERAL**

Section 271(a) provides that neither a Bell Operating Company ("BOC") nor any affiliate of a BOC may provide interLATA services except as provided in Section 271. 47 U.S.C. §271(a). Section 271(b)(1) provides that a BOC, or any affiliate of that BOC, may provide interLATA services originating in any of its in-region States if the FCC approves the application of such company under Section 271(d)(3). 47 U.S.C. §271(b)(1). Section 271(d)(1) authorizes a BOC or its affiliate to apply to the FCC on or after the date of enactment of the 1996 Act for authorization to provide interLATA services originating in any in-region State. 47 U.S.C. §271(d)(1).

Under Section 271(d)(3), the FCC must issue a written determination and state the basis for approving or denying the requested authorization within 90 days after receiving an application under Section 271(d)(1). 47 U.S.C. §271(d)(3). Section 271(d)(3) also provides that the FCC shall not approve the authorization requested in a Section 271(d)(1) application unless it finds that:

(A) the petitioning Bell operating company has met the requirements of subsection (c)(1) and--

(i) with respect to access and interconnection provided pursuant to subsection (c)(1)(A), has fully implemented the competitive checklist in subsection (c)(2)(B); or

(ii) with respect to access and interconnection generally offered pursuant to a statement under subsection (c)(1)(B), such statement offers all of the items included in the competitive checklist in subsection (c)(2)(B);

(B) the requested authorization will be carried out in accordance with the requirements of section 272; and

(C) the requested authorization is consistent with the public interest, convenience, and necessity.

47 U.S.C. §271(d)(3).

Section 271(d)(2)(B) requires the FCC to "consult with the State commission of any State that is the subject of the application in order to verify the compliance of the Bell operating company with the requirements of subsection (c)." 47 U.S.C. §271(d)(2)(B) (emphasis added). Thus, the explicit role of the Commission in an application by Ameritech for the FCC to authorize it to provide in-region interLATA services under Section 271(d)(1) is to "consult" with the FCC so as to verify whether Ameritech has complied with the requirements of Section 271(c). Section 271(d)(2)(A) requires that the FCC also notify and consult with the Attorney General regarding any application under Section 271(d)(1). 47 U.S.C. §271(d)(2)(A). The United States Department of

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